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7 *Attorneys for Debtors and Reorganized Debtors*

8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 **In re:**

12 **PG&E CORPORATION,**

13 **- and -**

14 **PACIFIC GAS AND ELECTRIC**  
15 **COMPANY,**

16 **Debtors.**

- 17 ☐ Affects PG&E Corporation  
18 ☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

19 *\* All papers shall be filed in the Lead Case, No.*  
20 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF A. ANNA CAPELLE IN  
SUPPORT OF REORGANIZED DEBTORS'  
ONE HUNDRED NINETEENTH OMNIBUS  
OBJECTION TO CLAIMS (NO LIABILITY  
CLAIMS)**

**Response Deadline:**  
**December 6, 2022, 4:00 p.m. (PT)**

**Hearing Information If Timely Response Made:**

Date: December 20, 2022

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, A. Anna Capelle, pursuant to section 1746 of title 28 of the United States Code, hereby declare  
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,  
3 and belief:

4 1. I am employed as a Managing Counsel, Litigation and Commercial Contracts, in the Law  
5 Department of Pacific Gas and Electric Company (the “**Utility**”), a wholly-owned subsidiary of PG&E  
6 Corporation (“**PG&E Corp.**”) and together with Utility, the “**Reorganized Debtors**” in the above-  
7 captioned chapter 11 cases (the “**Chapter 11 Cases**”). I have been employed in this role since May 1,  
8 2020, and prior to such date I was employed as Interim Managing Counsel, Strategy and Policy. I have  
9 been employed as an attorney for PG&E since October 2006. In my current role, I am responsible for  
10 supervising seven litigation attorneys, and advising leaders on litigation and general dispute issues. I  
11 also regularly consult with my colleagues elsewhere in the Utility’s Law Department on legal issues that  
12 cover a variety of other subject matters. I submit this Declaration in support of the *Reorganized Debtors’*  
13 *One Hundred Nineteenth Omnibus Objection to Claims (No Liability Claims)* (the “**Omnibus**  
14 **Objection**”),<sup>1</sup> filed contemporaneously herewith.

15 2. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon  
16 my personal knowledge, the knowledge of other personnel of the Reorganized Debtors working under  
17 and alongside me on this matter, including my colleagues elsewhere in the Utility’s Law Department,  
18 my discussions with PG&E’s professionals and various other advisors and counsel, and my review and  
19 my colleagues’ review of relevant documents and information. If called upon to testify, I would testify  
20 competently to the facts set forth in this Declaration. I am authorized to submit this declaration on behalf  
21 of the Reorganized Debtors.

22 3. The Omnibus Objection is directed at the Proof of Claim specifically identified in  
23 **Exhibit 1** thereto in the column headed “Claims to Be Disallowed and Expunged.”

24 4. **Exhibit 1** was prepared by the AlixPartners, LLP (“**AlixPartners**”) team charged with  
25 the Bankruptcy Case Management component of AlixPartners’ assignment to assist the Reorganized  
26 Debtors, based on information provided by me, and I have reviewed it to confirm its accuracy. I am

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27 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in  
28 the Omnibus Objection.

1 familiar with it, its contents, and the process under which it was prepared. To the best of my knowledge,  
2 information and belief, **Exhibit 1** accurately identifies the No Liability Claims.

3 5. After conducting a thorough review of the relevant Proofs of Claim, the Reorganized  
4 Debtors concluded that there is no basis for liability on the No Liability Claims. These Proofs of Claim  
5 provide insufficient supporting documentation to enable the Reorganized Debtors to understand the  
6 purported basis for liability and, after reviewing the allegations, the Reorganized Debtors are unable to  
7 determine any liability or basis for the asserted Claims.<sup>2</sup> The Reorganized Debtors issued Information  
8 Requests as to the Proofs of Claim, pursuant to the *Order Approving ADR and Related Procedures for*  
9 *Resolving General Claims* [Docket No. 9148], and received responses from the Claimants that did not  
10 meaningfully explain their allegations.

11 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
12 correct to the best of my knowledge, information, and belief. Executed this tenth day of  
13 November, 2022.



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15 A. Anna Capelle  
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27 <sup>2</sup> One of the No Liability Claims, Claim No. 7955, does include reasonably specific allegations regarding  
28 a portion of the damages claimed. However, as the claimant has acknowledged, he received and cashed  
a settlement check from the Reorganized Debtors for that portion of the claim.